

CHRISTOPHER CHIOU  
Acting United States Attorney  
District of Nevada  
Nevada Bar Number 14853  
EDWARD G. VERONDA  
Assistant United States Attorney  
501 Las Vegas Boulevard So., Suite 1100  
Las Vegas, Nevada 89101  
702-388-6336  
[Edward.G.Veronda@usdoj.gov](mailto:Edward.G.Veronda@usdoj.gov)  
*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ANABEL ENRIQUEZ-PEREA,  
  
Defendant.

Case No. 2:20-cr-00228-APG-BNW

**STIPULATION TO CONTINUE  
CHANGE OF PLEA HEARING**  
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Karen A. Connolly, counsel for Enriquez-Perea, that the Change of Plea Hearing currently scheduled on June 15, 2021 at 3:00 pm, be vacated and continued to a date and time convenient to the Court, but no sooner than August 9, 2021.

This Stipulation is entered into for the following reasons:

1. The Government provided additional discovery to Counsel. Counsel for the Defendant needs additional time to confer with her client regarding the discovery disclosure from the Government.

2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

4. Counsel for the Government is unavailable July 30, 2021 to August 4, 2021, but available all other times. Also, because Counsel for the Defendant is out of the jurisdiction for the entire month of July, Counsel for Defense is not available until after August 9, 2021.

5. The additional time requested herein is not sought for the purposes of delay, but to allow counsel for the defendant sufficient time to effectively and thoroughly research and prepare;

6. Denial of this request for continuance could result in a miscarriage of justice;

7. Denial of this request for continuance would deny undersigned counsel sufficient time to effectively and thoroughly review all discovery prior to the change of plea hearing, taking into account the exercise of due diligence; and

8. The additional time requested is excludable in computing the time within which an the trial must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A) considering the factors in Title 18, United States Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

9. This is the first request for a continuance of the Change of Plea Hearing.

DATED this 10<sup>th</sup> day of June, 2021.

CHRISTOPHER CHIOU  
Acting United States Attorney

By /s/ Karen A. Connolly, Esq.  
KAREN A. CONNOLLY  
Counsel for Defendant

By /s/ Edward J. Veronda  
EDWARD J. VERONDA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,  
5 v.  
6 ANABEL ENRIQUEZ-PEREA  
7 Defendant.

Case No. 2:20-cr-00228-APG-BNW-2

**ORDER**

8 **FINDINGS OF FACT**

9 Based on the pending Stipulation of counsel, and good cause appearing therefore,  
10 the Court finds that:

- 11 1. Counsel for the defendant needs additional time to meet with the defendant  
12 and review the recently disclosed discovery in this case;
- 13 2. Defense counsel and counsel for the Government agree to the continuance.
- 14 3. The defendant is in custody and does not object to the continuance;
- 15 4. The additional time requested herein is not sought for the purposes of delay,  
16 but to allow counsel for the defendant sufficient time to effectively and  
17 thoroughly research and prepare;
- 18 5. Denial of this request for continuance could result in a miscarriage of justice;
- 19 6. Denial of this request for continuance would deny undersigned counsel  
20 sufficient time to effectively and thoroughly prepare, taking into account the  
21 exercise of due diligence; and
- 22 7. The additional time requested is excludable in computing the time within  
23 which an the trial must commence pursuant to the Speedy Trial Act,  
24 Title 18, United States Code, Section 3161(h)(7)(A) considering the factors

1 in Title 18, United States Code, Sections 3161(h)(7)(B)(i) and  
2 3161(h)(7)(B)(iv).

3 **CONCLUSIONS OF LAW**

4 The ends of justice served by granting said continuance outweigh the best interest  
5 of the public and the defendant, because the failure to grant said continuance would be  
6 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and  
7 the opportunity within which to be able to effectively and thoroughly prepare, taking into  
8 account the exercise of due diligence.

9 The continuance sought herein is excusable under the Speedy Trial Act, Title 18,  
10 United States Code, Section 3161(b) and Title 18, United States Code, Section  
11 3161(h)(7)(A) considering the factors in Title 18, United States Code, Sections  
12 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

13 **ORDER**

14 IT IS THEREFORE ORDERED that the Change of Plea Hearing scheduled for  
15 June 15, 2021, at the hour of 3:00 p.m., be vacated and continued to  
16 August 17, 2021, at 1:30 p.m. in Courtroom 6C.

17 IT IS SO ORDERED. Entered: June 10, 2021

18 -

19  
20   
21 \_\_\_\_\_  
22 HON. ANDREW P. GORDON  
23 UNITED STATES DISTRICT JUDGE  
24